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22 Attorneys for Defendant
23 CITY AND COUNTY OF SAN FRANCISCO

24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA

26 HASTINGS COLLEGE OF THE LAW, a
27 public trust and institution of higher education
28 duly organized under the laws and the
Constitution of the State of California;
FALLON VICTORIA, an individual; RENE
DENIS, an individual; TENDERLOIN
MERCHANTS AND PROPERTY
ASSOCIATION, a business association;
RANDY HUGHES, an individual; and
KRISTEN VILLALOBOS, an individual,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, a municipal entity,

Defendant.

Case No. 4:20-cv-3033-JST

**DECLARATION OF EMILY COHEN IN
SUPPORT OF DEFENDANT CITY AND
COUNTY OF SAN FRANCISCO'S
OPPOSITION TO PLAINTIFFS' MOTION TO
ENFORCE STIPULATED INJUNCTION**

Hearing Date: May 23, 2024
Time: 2:00 p.m.
Place: Hon. Jon S. Tigar
Oakland Courthouse
Courtroom 6 – 2nd Floor
1301 Clay Street
Oakland, CA 94612

Trial Date: Not Set

1 I, EMILY COHEN, declare:

2 1. I have personal knowledge of the matters stated herein, and if called and sworn as a
3 witness could and would competently testify thereto.

4 2. I am employed by the San Francisco Department of Homelessness and Supportive
5 Housing (“HSH”) as the Deputy Director for Communications & Legislative Affairs. My duties
6 include managing the department’s federal, state and local legislative affairs, public communications,
7 media engagement, and community outreach and engagement.

8 3. I have worked at HSH since March 2020. Before that, I worked four years in various
9 capacities for the City and County of San Francisco, all focused on homeless services. I received my
10 MA in Urban and Environmental Policy and Planning from Tufts University in 2008. My Master’s
11 thesis investigated the implementation of Housing First as a model for homeless service delivery. I
12 received my Bachelor’s degree in politics from the University of San Francisco in 2004.

13 **A. Department of Homelessness and Supportive Housing**

14 4. HSH launched July 1, 2016, combining homeless-serving programs that had resided in
15 several city departments. HSH’s mission is to make homelessness in San Francisco rare, brief, and
16 one-time, through the provision of coordinated, compassionate, and high-quality services.

17 5. HSH’s budget for fiscal year 2023 (July 1, 2023-June 30, 2024) is \$639.5 million. This
18 budget amount does not include the value of other departments’ contributions to homeless-serving
19 programs, including the Department of Public Health, the Department of Public Works, the
20 Department of Emergency Management, the Police Department, and the Fire Department. All of these
21 departments partner with HSH to provide homeless services.

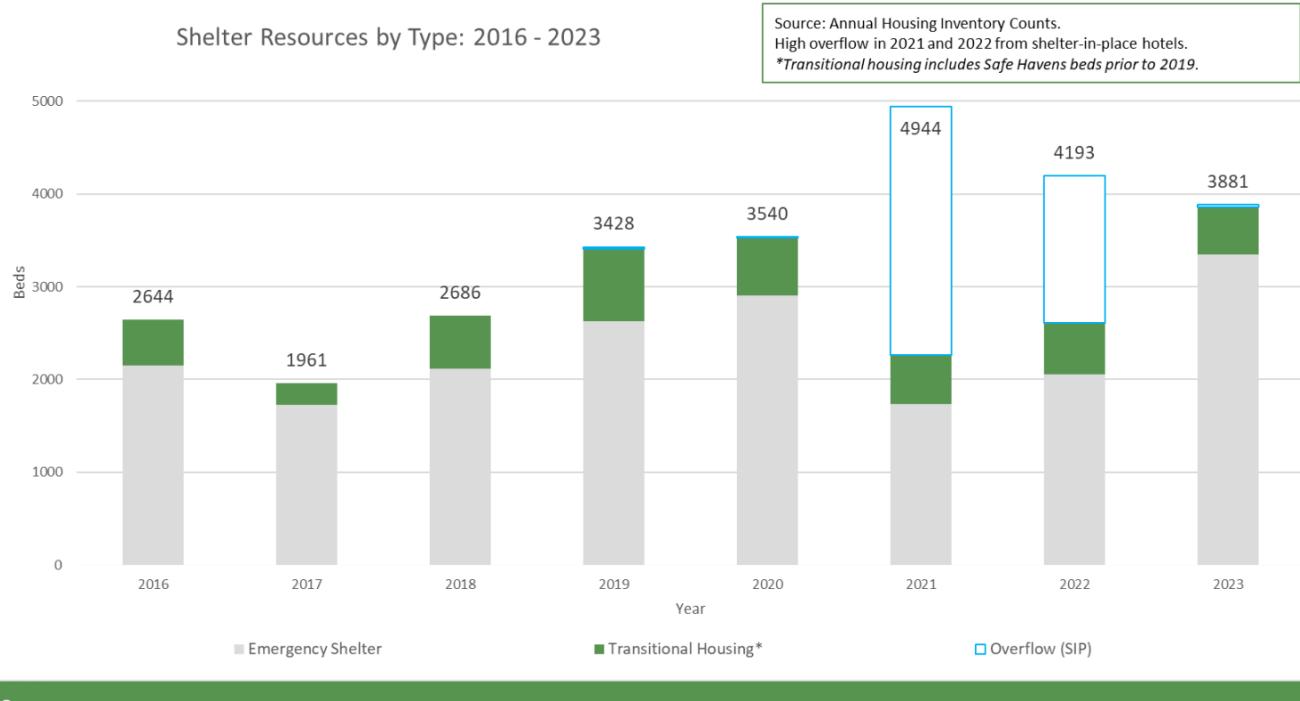
22 6. HSH estimates as many as 20,000 individuals may experience homelessness in San
23 Francisco over the course of a full year. Between July 1, 2019 to today, HSH assisted over 13,000
24 people to exit homelessness, through permanent supportive housing, rapid rehousing, prevention, and
25 problem solving, including relocation assistance.

26 7. In *Home by the Bay: An Equity Driven Plan to Prevent and End Homelessness in San*
27 *Francisco* (2023), HSH sets the goal of reducing unsheltered homelessness by fifty percent in five
28 years. In order to achieve this goal, HSH estimates that San Francisco needs an additional 4,300 slots

1 of homelessness prevention, 1075 new shelter beds and 3,250 new slots of housing. HSH estimates
 2 that this will cost more than \$607 million in additional funding during the five-year timeframe of this
 3 Plan; and more than \$217 million in additional funding annually, thereafter, increasing with inflation
 4 over time, to sustain the new investments.

5. One measure of HSH's success is the 15% decrease in unsheltered homelessness
 6 between 2019 and 2022, according to the annual Point-in-Time (PIT) homelessness count. The 2019
 7 PIT count identified 8,035 persons experiencing homelessness in San Francisco, of which 5,180 were
 8 unsheltered. The 2022 PIT count identified 7,554 people experiencing homelessness, of which 4,397
 9 were unsheltered. It is my understanding is that San Francisco was the only California county that
 10 registered a decrease of any size in its PIT count between 2019 and 2022.

9. HSH keeps records of its shelter resources by type. Included below is chart that tracks
 10 the amount of HSH shelter resources by type: (1) emergency shelter, transitional housing, and
 11 overflow shelter in place ("SIP") housing from 2016 through 2023.



10. HSH manages San Francisco's homelessness response system, which includes among
 1 other components: (1) street outreach; (2) temporary shelter and crisis intervention; (3) coordinated
 2 entry; (4) problem solving; (5) homelessness prevention; and (6) supportive housing.

11. **(1) Street outreach.**—San Francisco's Homeless Outreach Team (SFHOT) provides
 5 citywide outreach seven days a week, connecting individuals living outside with available and
 6 appropriate resources, through outreach, engagement, and case management. SFHOT works
 7 collaboratively with DPH's Street Medicine team to address medical and behavioral health needs.
 8 During the 2021 fiscal year, SFHOT made 1,652 shelter placements through this general work. In
 9 addition, SFHOT made approximately 1,000 placements in coordination with HSOC encampment
 10 resolutions.

11. SFHOT is also part of the Street Wellness Response Team. The Street Wellness
 12 Response Team was created in 2022, including SFHOT members and community paramedics from the
 13 Fire Department. The Street Wellness Response Team provides 24/7 coverage citywide, and it
 14 delivers a services-first alternative to law enforcement for 911 calls or 311 calls from the public. In
 15 addition, DPH also manages a Street Overdose Response Team and a Street Crisis Response Team,
 16 providing alternatives to law enforcement encounters and unnecessary emergency room use.

17. **(2) Temporary shelter and crisis intervention.**—Shelters provide temporary places
 18 for people to stay while accessing other services and looking for housing. HSH's temporary shelter
 19 inventory includes navigation centers, transitional housing, cabins, trailers, Shelter-in-Place hotels,
 20 other forms of congregate, non-congregate, and semi-congregate shelters, stabilization beds, and safe
 21 sleep sites. During the 2022-23 fiscal year, HSH provided emergency shelter for 8,920 people,
 22 transitional housing for 525 people, and crisis interventions for 288 people.

23. **(3) Coordinated entry.**—Coordinated Entry serves as the “front door” for connecting
 24 households experiencing homelessness to the resources needed to resolve their housing crisis. During
 25 the 2022-23 fiscal year, HSH's Coordinated Entry program conducted 10,831 assessments, a 24%
 26 increase from the previous year.

27. **(4) Problem solving.**—This program focuses on clients who do not require ongoing
 28 support, but who can resolve their homelessness with a timely intervention. This program includes

1 one-time flexible grants that can be used for one-time expenses that will help resolve their
 2 homelessness. Examples of possible uses of problem solving grants include vehicle repair, contribute
 3 to the household's rent, pay utility bills, buy furniture etc. This program also offers relocation
 4 assistance to reconnect clients with support networks they may have outside San Francisco.

5 **16. (5) Homelessness prevention.**—HSH operates its Homelessness Prevention Program
 6 in partnership with the Mayor's Office of Housing & Community Development. San Francisco
 7 allocates millions of dollars each year to households needing assistance with back rent, future rent,
 8 and/or move-in costs. During the 2022-23 fiscal year, HSH served 1,408 households at risk of
 9 homelessness.

10 **17. (6) Supportive housing.**—HSH devotes more than half of its annual budget to
 11 supportive housing, offering permanent solutions to homelessness. During the 2022-23 fiscal year,
 12 HSH moved 3,147 households into supportive housing and maintained 11,294 households in existing
 13 supportive housing. One of HSH's newest supportive housing project at 1064 Mission Street, next to
 14 the James R. Browning Federal Courthouse, offers 256 units of supportive housing, with on-site
 15 services and a culinary job training and education program.

16 **B. Shelter in Pace Hotels**

17 **18.** The COVID-19 pandemic prompted significant changes in San Francisco's response to
 18 homelessness. To comply with COVID-19 health guidelines, HSH reconfigured its congregate
 19 shelters, reducing their capacity by 70%, and opened a new congregate shelter site. The first Shelter-
 20 in-Place ("SIP") hotel sites opened in April 2020 to provide temporary non-congregate shelter for
 21 people experiencing homelessness who were most vulnerable to COVID-19.

22 **19.** At its highest capacity, San Francisco's SIP Hotel Program provided 2,288 rooms
 23 across 25 sites serving primarily homeless adults who were particularly vulnerable to COVID-19 due
 24 to their age or underlying health conditions.

25 **20.** The SIP Hotel Program ended in December 2022. As the program drew to a close, HSH
 26 worked to transition SIP Hotel guests to City-provided housing so that they did not become
 27 unsheltered when the program concluded. HSH and its partners helped three-quarters of guests exit to
 28 stable locations, including 1,835 who moved into housing.

1 21. The COVID-19 pandemic unlocked significant additional federal funding for San
 2 Francisco to temporarily house individuals living in encampments in order to prevent the spread of a
 3 life-threatening virus for which there was no vaccine. This public health effort to stop the spread of
 4 COVID-19 is not a program San Francisco could credibly be expected to fund absent significant
 5 federal support after the end of the pandemic.

6 22. The SIP Hotel Program cost approximately \$400 million to administer on the front end.
 7 The program also came at considerable back-end costs to the City. In addition to the negotiated cost,
 8 nine of the hotel sites brought claims to the City alleging that the guests otherwise unhoused guests
 9 caused millions of dollars' worth of damage. The City ultimately was required to pay more than \$60
 10 million to settle these claims.

11 23. Because of my role with HSH, I am familiar with many of San Francisco's efforts to
 12 support persons experiencing homelessness and to encourage those same people to accept shelter. I
 13 believe HSH makes every effort given the circumstances to achieve the goal of ensuring that every
 14 person who wants to accept shelter or other City-provided services is able to do so.

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17 I declare under penalty of perjury under the laws of the United States and the State of
 18 California that the foregoing is true and correct. Executed April 11, 2024 in San Francisco,
 19 California.

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EMILY COHEN